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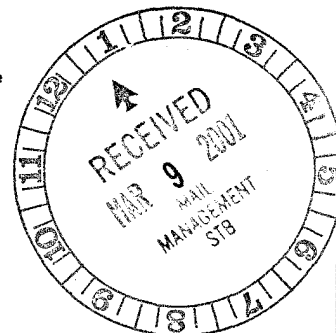
Via Hand-Delivery

Surface Transportation Board  
Office of the Secretary  
Case Control Unit  
1925 K Street, N.W.  
Washington, DC 20423

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Re: Ex Parte No. 582 (Sub-No. 1)  
Oral Argument

Dear Sir or Madam:

In response to the Board's decision of February 23, 2001, National Grain and Feed Association, which has filed written comments at all prior stages of this proceeding, requests 10 minutes of oral argument time to address the following issues: (1) the Board should require proof of direct benefits for rail customers following mergers or acquisitions, (2) the merged carriers should be required to maintain reasonable gateway access, operationally and economically, and (3) full post-merger accountability for service failures should be mandated through, among other things, rules for the processing of service claims under a standard of full accountability.

The person representing NGFA will be either:

Dr. Kendell Keith,  
President  
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or

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Sincerely,

Andrew P. Goldstein

Counsel to  
National Feed and Grain Association

APG/gb